

Brian C. Quiros, Esq.  
bquiros@garciamilas.com

Attorneys at Law  
44 Trumbull Street, New Haven, CT 06510, USA  
Phone 203 773 3824 Fax 203 782 2312  
www.garciamilas.com

January 25, 2017

VIA FIRST CLASS MAIL & EMAIL

Regional Freedom of Information Officer  
U.S. EPA, Region 1 (OARM01-6)  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912  
[r1foia@epa.gov](mailto:r1foia@epa.gov)

Re: **Freedom of Information Act Request**  
**Submitted Contractor Work Plan for the Demolition and Phase III Remediation**  
**Project of the Century Enterprise Center or Century Brass Mill or Brass Mill, or**  
**Century Brass; New Milford, Connecticut**

To Whom It May Concern:

Pursuant to 5 U.S.C. § 552, I hereby request access to all documents referring or relating to the submitted contractor work plan (the "Contractor Work Plan") submitted by Costello Dismantling Company ("Costello") on behalf of the Town of New Milford for the Demolition and Phase III Remediation Project of the Century Enterprise Center or Century Brass Mill or Brass Mill, or Century Brass, located at 12 Scovill Street, New Milford, Connecticut, (the "Project") including, without limitation:

1. Internal Documents and Communications, as well as comments, on or after January 4, 2016 by and among all employees, agents, servants, consultants, accountants, and representatives of the Department of Environmental Protection Agency ("EPA") regarding the submitted Contractor Work Plan for the Project.
2. Documents and Communications regarding the submitted Contractor Work Plan for the Project on or after January 4, 2016 between E.P.A. and any and all officers, members, employees, agents, servants, consultants, accountants, and representatives for:
  - a. Costello Dismantling Company;
  - b. TRC Environmental Consulting;
  - c. The Town of New Milford, Connecticut
  - d. Connecticut Department of Energy and Environmental Protection ("CTDEEP");
  - e. Strategic Environmental Services, Inc.;
3. For purposes of this request, the following definitions are employed:

- a. "Document" or "documents" or "communication" or "documentation" means any writing, letter, comment, notice, memorandum, drawing, plan, contract, subcontract, film, graph, chart, schedule, photograph, photocopy, tape record or other graphic matter of any kind or nature, and all mechanical and electronic sound recordings or transcripts thereof, and any retrievable data whether carded, taped, coded, electrostatically, electromagnetically or otherwise, or other data compilation from which information may be obtained, translated, if necessary, through detection devices into reasonably usable form, such as but not limited to, all notices, memoranda, diaries, minutes, purchase records, purchase invoices, market data, correspondence, computer storage tapes, computer storage cards, contracts, books, journals, ledgers, statements, reports, invoices, bills, vouchers, worksheets, jottings, notes, letters, abstracts, audits, agreements, charts, checks, diagrams, drafts, recordings, instructions, lists, logs, orders, recitals, financial, telegram messages, resumes, plans and drawings, specifications, summaries, change orders, any and all compilations of data or other records and any and all computation sheets, or other formal and informal writings or tangible preservations of information.. The term also means information stored in electronic form, and communications sent electronically, including e-mails, text messages, and wire instructions. A draft or non-identical copy is a separate document within the meaning of this term. Each and every document described herein shall be taken as including all attachments, enclosures or other document or documents. In addition, any document or documents relating to or referring only in part to the subjects herein are covered in their entirety by this definition. E-mail (including the use of personal e-mail addresses of employees, Board or Council members written as part of their official capacities) is included.
- b. "Communication" also means every manner or means of disclosure, transfer or exchange of information whether orally or in writing, whether face-to-face, by telephone, facsimile, electronic mail, mail delivery, or otherwise.
- c. "Person" means all individuals and entities, including but not limited to all individuals, sole proprietorships, associations, companies, partnerships, joint ventures, corporations, trusts, estates, or any local, county, state, or federal governmental body, agency, or official.

Please contact me to discuss how quickly you will be able to make these documents available for inspection. I will then be able to identify what, if any, documents I will need copied.

Thank you for your cooperation.

Sincerely,



Brian C. Quiros

BCQ/II